

**To:** Campbell, Rich[Campbell.Rich@epa.gov]  
**From:** Howard Shanker  
**Sent:** Tue 4/8/2014 11:57:26 PM  
**Subject:** Hickman Egg (Desert Pride) CAFO, Tonopah, Arizona

Hey Rich; Are we making any progress with EPA on this?

1. The U.S. EPA defines a large concentrated animal feed operation ("CAFO") as 82,000 laying hens if a dry manure handling system is used and 30,000 laying hens if a wet system is used. 40 C.F.R. § 122.23(b)(4)((ix) and (xi). The Facility will have approximately 2,200,000 (2.2 million) laying hens in its first phase of operation and will subsequently house approximately 12,000,000 (12 million) laying hens in a confined area.

2. It's being built essentially in a flood plain and adjacent to washes that feed directly into jurisdictional waters of the United States;

3. They are building it with no permits;

4. Arizona's CAFO General Permit has expired. I assume this means they need to get an individual AZPDES - which they have taken no steps to do.

5. I do not know if the CAFO General Construction Permit expired as well - I previously sent you everything (along with comment) that was produced in response to my public records request on all AZPDES, APP and construction issues.

What else can I get you to help bring EPA in? Thanks.

Howard M. Shanker

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